

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

Plaintiff,

v.

GINA MICHELLE BISIGNANO

Defendant.

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Case No. 21-CR-036

JOINT MOTION FOR CONTINUANCE OF TELECONFERENCE

TO THE HONORABLE CARL J. NICHOLS, JUDGE OF SAID COURT:

The Defendant, Gina Michelle Bisignano, jointly with the United States of America, by Kimberly L. Paschall, Assistant United States Attorney, respectfully move for a continuance of the teleconference scheduled for June 28, 2021, in the above captioned case. Both parties jointly propose a continuance date of July 6, 2021, or July 14, 2021, and in support thereof, aver as follows:

1. That, in reference to the above captioned case, a teleconference is presently scheduled for June 28, 2021.
2. That both counsel for the defense, A. Charles Peruto, Jr., Esquire, and the United States of America, by Kimberly L. Paschall, Assistant United States Attorney, have a scheduling conflict with the current date of the conference – June 28, 2021 – and are unavailable on this date.
3. Both parties have discussed this joint request for a continuance and agree on their availability for the teleconference to take place on a future date of July 6, 2021, or July 14, 2021.

WHEREFORE, for the foregoing reasons, both the Government and Defendant jointly request that this Court continue the teleconference currently set for June 28, 2021, to July 6, 2021, or July 14, 2021.

Dated: _____

Respectfully submitted,
Channing D. Phillips
Acting United States Attorney

/s/ Kimberly L. Paschall
By: _____
Kimberly L. Paschall
Assistant United States Attorney
D.C. Bar No. 1015665
555 4th Street, N.W., Room 4116
Washington, D.C. 20530
T: 202-252-2650
Email: Kimberly.Paschall@usdoj.gov

Respectfully submitted,

/s/ Charles Peruto, Jr.
By: _____
A. Charles Peruto, Jr. Esquire
Attorney for Defendant
2016 Spruce Street
Philadelphia, PA 19103
T: 215-735-1010/F: 215-545-6138
Email: chuck@peruto.com

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CERTIFICATE OF SERVICE

I, A. Charles Peruto, Jr., Esquire, hereby certify that a true and correct copy of the foregoing Motion has been served upon the following by first-class mail, and/or electronic filing, and is available for viewing and downloading from the ECF system:

Kimberly L. Paschall
Assistant United States Attorney
D.C. Bar No. 1015665
555 4th Street, N.W., Room 4116
Washington, D.C. 20530
T: 202-252-2650
Email: Kimberly.Paschall@usdoj.gov

June 24, 2021

Dated: _____

/s/ A. Charles Peruto, Jr.

By: _____

A. Charles Peruto, Jr. Esquire
Attorney for Defendant
2016 Spruce Street
Philadelphia, PA 19103
T: 215-735-1010/F: 215-545-6138
Email: chuck@peruto.com

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ORDER

AND NOW, to wit, this _____ day of _____ 2021, upon consideration of the within motion, IT IS HEREBY ORDERED by the Court, that said motion is GRANTED, and that the teleconference of this matter currently scheduled for June 28, 2021, is continued to the _____ day of _____ 2021.

BY THE COURT,

HONORABLE CARL J. NICHOLS